IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Spicey Lynn Scales, Debtor Case No. 24-02917-KMS
CHAPTER 13

NOTICE

The above referenced debtor has filed papers with the court to allow payment arrearage.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amortize the payments, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Dan M. Russell, Jr. United States Courthouse
2012 15th St., Ste. 244
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Allow Payment Arrearage.

Date: June 26, 2025 Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer Ann Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O Box 13767 Jackson, MS 39236

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Spicey Lynn Scales, Debtor Case No. 24-02917-KMS
CHAPTER 13

MOTION TO ALLOW PAYMENT ARREARAGE

COMES NOW, Debtor, by and through counsel, and moves this Court to amortize their past due Chapter 13 plan payments, and in support thereof, would show the Court as follows:

- 1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
- 2. Debtor fell behind on her payments.
- 3. Debtor is requesting this Honorable Court to amortize the past due plan payments over the life of the plan, including any ongoing mortgage payments being paid through the plan.
- 4. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in August 2025.
 WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
Jennifer Ann Curry Calvillo (MS Bar No. 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Allow Payment Arrearage was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4	UNITED STATES BANKRUPTCY COURT
5	SOUTHERN DISTRICT OF MISSISSIPPI
6	IN RE: CASE NO: 24-02917-KMS SPICEY LYNN SCALES DECLARATION OF MAILING
7	CERTIFICATE OF SERVICE
8	Chapter: 13
9	
10	
11	On 6/26/2025, I did cause a copy of the following documents, described below,
12	Notice and Motion to Allow Payment Arrearage
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18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
21	Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
23	served electronically with the documents described herein per the ECF/PACER system. DATED: 6/26/2025
24	<u>/s/ Thomas C. Rollins, Jr.</u> Thomas C. Rollins, Jr.
25	Attorney at Law The Rollins Law Firm
26	702 W. Pine Street Hattiesburg, MS 39401
27	601 500 5533 trollins@therollinsfirm.com
28	

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4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI
5	IN RE: CASE NO: 24-02917-KMS
6	SPICEY LYNN SCALES CASE NO. 24-02917-RWIS CERTIFICATE OF SERVICE
7	DECLARATION OF MAILING
8	Chapter: 13
9	
10	
11	On 6/26/2025, a copy of the following documents, described below,
12	Notice and Motion to Allow Payment Arrearage
13	
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19	were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20	postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
21	The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
22	Service and that it is true and correct to the best of my knowledge, information, and belief.
23	DATED: 6/26/2025
24	
25	Willm bl
26	Miles Wood BK Attorney Services, LLC
27	d/b/a certificateofservice.com, for Thomas C. Rollins, Jr.
28	The Rollins Law Firm 702 W. Pine Street
	Hattiesburg, MS 39401

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USPS FIRST CLASS MAILING RECIPIENTS: Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 24-02917-KMS SOUTHERN DISTRICT OF MISSISSIPPI THU JUN 26 11-50-7 PST 2025 EXCLUDE

(U) HOPE FEDERAL CREDIT UNION

US BANKRUPTCY COURT THAD COCHDAN HE COHDTHOUGH 501 E COURT STREET SUITE 2300

JACKSON MS 39201 5036

ADVANCE AMERICA 935 FRONTAGE RD MERIDIAN MS 39301

COMCAST PO BOX 1931

BURLINGAME CA 94011-1931

CAPITAL ONE ATTN BANKRUPTCY PO BOX 30285

SALT LAKE CITY UT 84130-0285

CASHNETUSA 175 W JACKSON BLVD SUITE 600 CHICAGO IL 60604-2948 EAST MS HEALTH CARE 10330 RD 375 PHILADELPHIA MS 39350-3249 FLOWOOD CAPITAL ORTHO 104 BURNLEY DR FLOWOOD MS 39232-6621

EXCLUDE

(P) DOVENMUEHLE MORTGAGE 1 CORPORATE DRIVE SUITE 360 LAKE ZURICH IL 60047-8945

(D) (P) DOVENMUEHLE MORTCAGE 1 CORPORATE DRIVE SUITE 360 LAKE ZURICH IL 60047 8945

(P) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999

LVNV FUNDING LLC RESURGENT CAPITAL SERVICES

PO BOX 10587 GREENVILLE SC 29603-0587

LVNV FUNDING ATTN BANKRUPTCY PO BOX 10497 GREENVILLE SC 29603-0497

NATALIE KAREDA BROWN RUBIN LUBLIN LLC FOR HOPE FEDERAL CREDIT UNION 3145 AVALON RIDGE PLACE SUITE 100 PEACHTREE CORNERS GA 30071-1570

NATIONAL CREDIT ADJUST PO BOX 3023 327 W 4TH STREET HUTCHINSON KS 67501-4842

NATIONAL CREDIT ADJUST PO BOX 550 HUTCHINSON KS 67504-0550 REGIONS BANK PO BOX 10063 BIRMINGHAM AL 35202-0063

SCOLOPAX LLC CO WEINSTEIN RILEY PS 749 GATEWAY SUITE G-601 ABILENE TX 79602-1196 US ATTORNEY GENERAL US DEPT OF JUSTICE 950 PENNSYLVANIA AVENW WASHINGTON DC 20530-0001 US DEPT OF EDUCATION PO BOX 7859 MADISON WI 53707-7859

US DEPT OF EDUCATION

CO US ATTORNEY 501 E COURT ST STE 4430 JACKSON MS 39201-5025 501 EAST COURT STREET

600 GALLERIA PKWY SE ATLANTA GA 30339-5994

DEBTOR

JACKSON MS

SPICEY LYNN SCALES 2107 GRAND AVE MERIDIAN MS 39301-6652

ROLLINS PO BOX 13767

XFINITYCOMCAST